

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**THE FINANCIAL OVERSIGHT
MANAGEMENT BOARD FOR PUERTO RICO**
As Representative of

THE COMMONWEALTH OF PUERTO RICO
Debtor

CASE NO. 17-BK-03283 (LTS)

PROMESA TITLE III

**MOTION FOR RECONSIDERATION, REITERATING REQUEST TO WITHDRAW AS
COUNSEL FOR PFZ PROPERTIES, INC. AND TO CEASE RECEIVING NOTICES**

TO THE HONORABLE COURT:

NOW COMES Movant, PFZ PROPERTIES, INC., by its undersigned attorneys and to the Honorable Court respectfully represents:

1. On September 8, 2017, movant filed a Motion For Leave to Withdraw in the case of reference.

2. On September 11, 2017, this Honorable Court entered an Order Regarding Defective Motion For Leave to Withdraw. Said Order was based on the incorrect premise that the above mentioned motion was filed pursuant to Local Rule 9010-1(3)(A), when in fact, precisely because of what that Rule states regarding the coetaneous appearance of other counsel, withdrawing counsel requested the leave of court to so withdraw, as required by Local Rule 9010-1(3)(C). Withdrawing counsel was fully aware that there was no other counsel appearing on behalf of movant at that time and, therefore, leave of court was required and was so requested.

3. In said Order, this Honorable Court granted movant until 18 September 2017 to file an amended Motion to Withdraw. Said Motion could not be filed by said date due to the then impending passage of Hurricane María and thereafter due to the lack of power, internet and access to our offices as a result of the hurricane. Consequently, it's being filed now.

4. In further support of the Motion to Withdraw, withdrawing counsel wishes to direct this Honorable Court's attention to the recent filing of a Notice of Appearance and Request for Notice,

filed by brother counsel David Carrión Baralt, Esq., wherein he states that he has been retained by PFZ Properties, Inc. to represent it in all matters pertaining to the instant case. (DE #1445).

5. Therefore, undersigned withdrawing counsel is interested in having this Honorable Court take notice of the above and grant the request for withdrawal as counsel for PFZ Properties in the instant case.

WHEREFORE, the subscribing attorney respectfully requests from this Honorable Court that it takes notice of the above stated and, consequently, authorizes the subscribing attorney's withdrawal as legal representation for PFZ Properties, Inc., and directs the Clerk's office to cease the remittance of notices to undersigned counsel, with such further relief as is just and proper.

RESPECTFULLY SUBMITTED

I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the Office of the United States Trustee, Attorneys of record and by US Postal Service to PFZ Properties, Inc., ESJ Towers, 6165 Isla Verde Ave., Carolina, Puerto Rico 00979-5729.

In San Juan, Puerto Rico, this 19th day of October, 2017.

LAW OFFICES ISMAEL H. HERRERO III, P.S.C,
P.O. Box 362159
San Juan, Puerto Rico 00936-2159
Tel. (787) 754-5000, Fax 754-5001
herreroiii@herrerolaw.com

/s/ ISMAEL H. HERRERO III
USDC-PR No. 203002